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VIA E-FILE

The Honorable Royce C. Lamberth
United States District Court
Western District of Texas, San Antonio Division
655 E. Cesar E. Chavez Blvd.
San Antonio, TX 78206

**RE: USA v. Vascular Solutions, Inc. et al.
Court File No. 5:14-CR-00926-RCL-1
Our File No. 28614.0001**

Dear Judge Lamberth:

We write on behalf of a number of our clients who are current employees of Vascular Solutions, Inc. ("VSI"), including Carrie Powers, Susan Christian, Richard Steitzer, Elizabeth Matthews, Shane Carlson, Anthony Ramiro, John DeVito, Robert Lehoullier, and Christopher Harrelson, regarding the United States' request to unseal all of the filings in the above-captioned matter.

With the exception of the Witnesses' Memorandum in Opposition to United States' Motion to Disqualify Jon Hopeman and Marnie Fearon as Counsel for Current VSI Employees, along with its accompanying affidavit and exhibits ("Memorandum in Opposition to Motion to Disqualify"), we take no position on the United States' request. *See* ECF No. 151.

However, certain portions of the Memorandum in Opposition to Motion to Disqualify included information protected by the attorney-client privilege and were provided to the Court ex parte. We object to the disclosure of any portions of documents that were filed ex parte. We do not object to unsealing the redacted version of the Memorandum in Opposition to Motion to Disqualify, as privileged information was removed from the redacted version. *See* ECF No. 153.

If the Court has further questions or is inclined to consider disclosure of materials filed ex parte, we request the Court delay ruling on the issue and allow additional time for submissions of legal memoranda. Thank you.

Very truly yours,

/s/ Jon M. Hopeman

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